

Exhibit 35

1 Michael A. Albert; malbert@wolfgreenfield.com
2 (Admitted *pro hac vice*)
3 Hunter Keeton; hkeeton@wolfgreenfield.com
4 (Admitted *pro hac vice*)
5 WOLF, GREENFIELD & SACKS, P.C.
6 600 Atlantic Avenue
7 Boston, MA 02210
8 T: (617) 646-8000; F: (617) 646-8646

9 Victor M. Felix (SBN: 179622);
10 victor.felix@procopio.com
11 PROCOPIO CORE HARGREAVES AND
12 SAVITCH LLP
13 522 B Street, Suite 2200
14 San Diego, CA 92101-4469
15 (619) 515-3229 Phone; (619) 744-5409 Fax

16 Attorneys for Defendant and Counter Claimant
17 Acacia Communications, Inc.

18 UNITED STATES DISTRICT COURT
19 SOUTHERN DISTRICT OF CALIFORNIA
20

21 **ViaSat, Inc.,**
22 *a Delaware corporation,*
23
24 Plaintiff
25 and Counter Defendant,

26 v.

27 **Acacia Communications, Inc.,**
28 *a Delaware corporation,*

Defendant
and Counter Claimant

Case No. 3:16-cv-00463-BEN-JMA

**Acacia Communications, Inc.'s
Responses to ViaSat, Inc.'s Requests
for Production (Set One)**

Dis. Judge: Hon. Robert T. Benitez
Hon. Magistrate Jan M. Adler

Case Initiated January 21, 2016

INITIAL GENERAL OBJECTIONS

Defendant and Counter-Claimant Acacia Communications, Inc. (“Acacia”) provides its initial General Objections to Plaintiff and Counter-Defendant ViaSat, Inc.’s (“ViaSat”) Requests for Production as follows.

ViaSat served its discovery requests prior to identifying its alleged trade secrets. California’s Uniform Trade Secrets Act requires ViaSat to identify its allegedly misappropriated trade secrets “with reasonable particularity” prior to commencing discovery. Cal. Code. Civ. Proc. § 2019.210. Consequently, ViaSat’s pending requests are untimely.

Acacia will provide a full set of General Objections, Specific Objections, and Responses to ViaSat’s discovery requests after ViaSat provides the required identification of its trade secrets. That full set of responses will be due according to the timeline set forth by Federal Rules of Civil Procedure 33(b)(2), 34(b)(2)(A), 36(a)(3), and 6(d) respectively (30 + 3 days) after ViaSat complies with Cal. Code. Civ. Proc. § 2019.210.

Date: October 3, 2016

/s/ Hunter D. Keeton

Michael A. Albert

Hunter D. Keeton

WOLF, GREENFIELD & SACKS, P.C.

600 Atlantic Ave.

Boston, MA 02210

(617) 646-8000 Phone

(617) 646-8646 Fax

CERTIFICATE OF SERVICE

I certify that today I am causing the foregoing document to be served by electronic means via email upon counsel for ViaSat, Inc., per the agreement of counsel.

Date: October 3, 2016

/s/ Hunter D. Keeton

Hunter D. Keeton